

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIAN BAUMANN,

Plaintiff,

V.

CHARLES LORD,

Defendant.

Case No. 07-7228

Judge Zagel

Magistrate Judge Brown

**DEFENDANT’S UNOPPOSED SECOND MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Charles Lord hereby moves for a thirty-day extension of time in which to answer or otherwise plead to Plaintiff Marian Baumann's Complaint. In support of this Motion, Lord states as follows:

1. Lord removed this action to this Court from the Circuit Court of Cook County, Illinois on December 26, 2007.
2. Under Federal Rule of Civil Procedure 81(c)(2)(C), Lord's answer or responsive pleading was originally due on January 4, 2008.
3. Both before and after Lord removed this action to this Court, the parties were engaged in attempts to resolve this matter.
4. On January 4, 2008, Lord filed an Unopposed Motion for Extension of Time to Answer or Otherwise Plead. In that Motion, Lord stated that the parties intended to submit this matter to mediation within the next thirty days, and he asked the Court to extend the

deadline for his Answer by thirty days to allow time for the parties to attempt resolution.

The Court granted that motion and extended Lord's deadline to February 4, 2008.

5. The parties have since submitted this matter to mediation. The parties have reached an oral agreement to resolve the matter.
6. However, before stipulating to dismiss this suit, the parties still must reduce their oral agreement to writing and see to other details of their resolution of this matter.
7. Accordingly, Lord asks for another thirty-day extension of the deadline to answer or otherwise respond to Baumann's Complaint. Lord expects that the parties will likely file a stipulation of dismissal during that timeframe.
8. Lord's counsel discussed this matter with Baumann's counsel prior to filing this Motion, and Baumann's counsel has no objection.

WHEREFORE, Lord respectfully requests that the Court grant this Motion and extend his deadline to answer or otherwise respond to the Complaint by thirty days, or until March 5, 2008.

Dated: February 4, 2008

CHARLES LORD

By: /s/ Jane M. McFetridge

One of His Attorneys

Jane M. McFetridge
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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on February 4, 2008, he caused a true and correct copy of the foregoing Defendant's Unopposed Second Motion for Extension of Time to Answer or Otherwise Plead to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system, including:

William Lynch Schaller
Peter P. Tomczak
Baker & McKenzie LLP
Suite 3500
130 East Randolph
Chicago, IL 60601

/s/ Neil H. Dishman
Neil H. Dishman